

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In RE: Harshal Dear	:	Chapter 7
	:	
Debtor	:	
	:	24-10449
Harshal Dear,	:	
	:	
Movant	:	
	:	
v.	:	
	:	
Lynn Feldman, Chapter 7 Trustee,	:	
	:	
Respondent	:	

ANSWER TO MOTION FOR PROTECTIVE ORDER

1. Debtor's motion for a protective order is not overly broad or unduly burdensome upon the Trustee.
2. The averment's of the motion to compel filed by Attorney Vicki Piontek are incorporated by reference.
3. Debtor is seeking specific information about the person or person's who have offered to buy out the estate.
4. This is entirely relevant because Debtor has raised credible issues of certain crypto-currency being liquidated by her estranged husband. Such liquidated funds have never been accounted for.
5. Debtor believes and avers that such unaccounted for funds may be part of the Bankruptcy estate.
6. Debtor has knowledge that certain offers have been made to buy out the estate.
7. Debtor believes and avers that the person who has been offering to buy out the estate is her estranged husband or a person closely affiliated with him.
8. Debtor's discovery requests are also relevant at this point because Debtor's house has not been put up for sale by the Trustee yet and Debtor is wondering why not. The assets of the estate have not been marshalled by the Trustee.

Respectfully Submitted,

/s/ Vicki Piontek

10/7/2024

_____ Vicki Piontek, Esquire Attorney for Debtor 58 East Front Street, Danville, PA 17821 vicki.piontek@gmail.com 215-290-6444	_____ Date Fax: 866-408-6735
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Certificate of Service

I also sent a true and correct copy of the attached answer / response to the parties at the addresses below by First Class U.S. mail, postage pre-paid.

Howard Gershman, Esquire,
Attorney for Trustee Lynn Feldman
P.O. Box 245
Fort Washington, PA 19034

Also emailed to Attorney Howard Gershman at howard@gershman-law.com

Richard N. Lipow, Esquire
on behalf of Joshua Dear
43 Stonehedge Dr
Glenmoore PA 19343

Also emailed to Attorney Richard Lipow at richard@lipowlaw.com

/s/ Vicki Piontek 10/7/2024

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Date of Service